



Wiley Rein & Fielding LLP

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

Virginia Office  
7925 JONES BRANCH DRIVE  
SUITE 6200  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wrf.com

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Gregory J. Vogt  
202.719.3240  
gvogt@wrf.com

Ms. Marlene H. Dortch  
Secretary,  
Federal Communications Commission  
445 Twelfth Street S.W.  
Washington, D.C. 20554

**Re: *Ex Parte* Presentation, CC Docket Nos. 96-45, 01-92, 00-256; WC Docket  
Nos. 05-25, 03-166**

Pursuant to Section 1.1206 of the Commission's rules, Mimi Weyforth Dawson, Gregg Elias and the undersigned of Wiley Rein & Fielding LLP met with Daniel Gonzalez, Chief of Staff, and Michelle Carey, Legal Advisor to Chairman Martin, on June 13, 2005. They discussed the unique circumstances faced by mid-sized telecommunications carriers who serve primarily rural Americans. They indicated that several rules are a disincentive to investment in network infrastructure in these areas and that there is a serious need to reform these antiquated policies.

Those rules, which should be eliminated or substantially modified to take into account rural circumstances, include the parent trap rule, 47 C.F.R. § 54.305, the price cap "all or nothing" rule, 47 C.F.R. § 61.41(c), and the pricing flexibility rules for price cap carriers, 47 C.F.R. §§ 69.701-31. They also urged the Commission to address issues associated with the operation of the price cap low-end adjustment rule, 47 C.F.R. § 61.45(b)(1)(i).

Respectfully submitted,

/s/ *Gregory J. Vogt*

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Gregory J. Vogt

cc: Daniel Gonzalez  
Michelle Carey